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May 5, 2025

VIA ECF

Honorable Pamela K. Chen, United States District Judge
United States District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. McMahon, et al.
Docket No. 21-cr-265

Dear Judge Chen,

As Your Honor is aware, this Firm represents Defendant Michael McMahon in the above-referenced matter. I write to respectfully request that the Court enter the attached Proposed Order, which will allow Mr. McMahon to travel to Virginia four (4) days, from Thursday, May 8, 2025 to Sunday, May 11, 2025, to attend the wedding of his nephew, William McNicholas on Saturday, May 10, 2025, as well as to travel to Florida for five (5) days from Sunday, May 11, 2025 to Thursday, May 15, 2025 for the purpose of meeting with the Pipe Hitter Foundation.

We have been in contact with Joseph Elie of the United States Office of Pretrial Services, who has advised that his Office consents to Mr. McMahon's proposed travel, given that Mr. McMahon has, throughout the long pendency of this matter, always been in full compliance with the terms of his pretrial release; Pretrial Services requests only that it be provided with a travel itinerary, which we will certainly provide – that requirement is reflected in the Proposed Order attached hereto. The Government has advised that it takes no position with respect to Mr. McMahon's proposed travel.

If the enclosed Order is satisfactory to Your Honor, we would be most grateful if the Court would execute and file it at Your Honor's earliest convenience, given the timing of the proposed travel. Of course, if Your Honor has any questions or concerns, please do not hesitate to contact me. Thank you for your kind consideration of this matter.

Respectfully submitted,

s/ Lawrence S. Lustberg
Lawrence S. Lustberg

cc: All counsel of record (via ECF)